

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Nicholas James Edeline Debtor(s)  Freedom Mortgage Corporation Movant  vs.  Nicholas James Edeline Debtor(s)  Kenneth E. West Trustee		CHAPTER 13      NO. 21-12701 AMC      11 U.S.C. Section 362
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**MOTION OF Freedom Mortgage Corporation  
FOR RELIEF FROM THE AUTOMATIC STAY  
UNDER SECTION 362**

1. Movant is Freedom Mortgage Corporation.
2. Debtor(s) is/are the owner(s) of the premises 4600 Higbee Street, Philadelphia, PA 19135, hereinafter referred to as the mortgaged premises.
3. Movant is the holder of a mortgage, original principal amount of \$102,999.00 on the mortgaged premises that was executed on March 17, 2017. The mortgage has been assigned as follows:  
  
Assigned to Freedom Mortgage Corporation on April 26, 2023, recorded in Philadelphia County on April 26, 2023, Doc Id: 54173223.
4. Kenneth E. West is the Trustee appointed by the Court.
5. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtor(s).
6. Debtor(s) has/have failed to make the monthly post-petition mortgage payments in the amount of \$788.34 for the months of April 2024 through July 2024, with a suspense balance of \$548.10.
7. In addition to the other amounts due to Movant reflected in this Motion, as of the date hereof, in connection with seeking the relief requested in this Motion, Movant has also incurred legal fees and legal costs. Movant reserves all rights to seek an award or allowance of such fees and expenses in accordance with applicable loan documents and related agreements, the Bankruptcy Code and otherwise applicable law.

8. The total amount necessary to reinstate the loan post-petition is \$2,605.26.

9. Movant is entitled to relief from stay for cause.

10. This motion and the averments contained therein do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this motion, including fees and costs, due under the terms of the mortgage and applicable law.

WHEREFORE, Movant prays that an Order be entered modifying the Stay and permitting Movant to proceed with its mortgage foreclosure on the mortgaged premises, and to allow the Sheriff's Grantee to take any legal action to enforce its right to possession of the mortgage premises. Further, Movant prays that an Order be entered awarding Movant the costs of this suit, reasonable attorney's fees in accordance with the mortgage document and current law together with interest.

/s/ Denise Carlon

Denise Carlon, Esquire

KML Law Group, P.C.

701 Market Street, Suite 5000

Philadelphia, PA 19106-1532

Phone: (215) 627-1322 Fax: (215) 627-7734

Attorneys for Movant/Applicant